

# **Exhibit 1**

**From:** [Greenfield, Elliot](#)  
**To:** [Laura King](#); [Born, Natascha](#); [Schlegelmilch, Stephan J](#); [Hahn, Ashley V.](#); [michael@mjllaw.com](mailto:michael@mjllaw.com); [sahuja@dmablaw.com](mailto:sahuja@dmablaw.com); [jacabed@mjllaw.com](mailto:jacabed@mjllaw.com); "William Kraus"; [ccording@willkie.com](mailto:ccording@willkie.com)  
**Cc:** [Andrew Dunlap](#); [Oscar Shine](#); [Xinchen Li](#); [Isaac Kirschner](#); [Katie Buoymaster](#); [Todd M. Schneider](#); [Matthew S. Weiler](#); [Sunny S. Sarkis](#); [Srujana Shivji](#); [Raymond S. Levine](#)  
**Subject:** RE: In re Tether and Bitfinex Crypto Asset Litigation, No. 1:19-cv-09236-KPF  
**Date:** Wednesday, July 10, 2024 1:57:24 PM

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Hi Laura. We're not available tomorrow afternoon but could do 2-5pm on Friday if that works for you and for Willkie.

With respect to the schedule, we propose the following:

Answer to the SAC: August 30, 2024.

Class certification briefing on the same schedule previous ordered, with Plaintiffs' motion and supporting expert reports due on September 20, 2024. That would make the deadline for deposing plaintiffs' experts November 20, 2024, defendants' opposition and supporting expert reports due December 20, 2024, deadline to depose defendants' experts February 20, 2025, and plaintiffs' reply due March 20, 2025.

Other expert discovery on the same schedule previously ordered:

j. Other than experts for class certification, the parties shall serve opening expert reports, no later than **2 months after any order certifying a class**. Parties shall serve any expert reports in opposition to opening reports (limited to responding to the opening reports) no later than **4 months after any order certifying a class**. Parties shall serve any expert reports in reply to opposition reports (limited to responding to the rebuttal reports) no later than **6 months after any order certifying a class**.

k. All expert discovery, including reports, production of underlying documents, and depositions, shall be completed no later than **9 months after any order certifying a class**.

For summary judgment and Daubert briefing, we'd propose to those simultaneously, as summary judgment is likely to depend heavily on expert reports. As previously ordered, we'd have the pre-motion submission for summary judgment due within 30 days of the close of expert discovery, or earlier for good cause. And then brief summary judgment and Daubert together on a 60-60-30 schedule.

Let us know if this works for Plaintiffs and for Potter. Happy to discuss further on our call.

Thanks,  
Elliot

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**From:** Laura King <lking@selendygay.com>

**Sent:** Wednesday, July 10, 2024 8:02 AM

**To:** Greenfield, Elliot <egreenfield@debevoise.com>; Born, Natascha <nborn@debevoise.com>; Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>; Hahn, Ashley V. <avhahn@debevoise.com>; michael@mjlaw.com; sahuja@dmablaw.com; jacabed@mjlaw.com; 'William Kraus' <william.kraus@pierferd.com>; cccording@willkie.com

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**\*EXTERNAL\***

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Counsel,

Per the Court's order, please let us know your availability to meet and confer regarding the July 26 submission. We are available between 2-5pm tomorrow.

Thanks,  
Laura

**Laura King**

Associate [\[Email\]](#)

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